

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil Action  
No: 21-cv-12081-NMG

COMPLAINT OF VIKING POWER, LLC  
FOR EXONERATION FROM OR  
LIMITATION OF LIABILITY,  
CIVIL AND MARITIME

**MOTION FOR ENTRY OF DEFAULT PURSUANT TO RULE F(5) OF THE  
SUPPLEMENTAL RULES FOR CERTAIN ADMIRALTY AND  
MARITIME CLAIMS**

Now comes the Plaintiff, Viking Power, LLC, as owner of the M/V MISS DUNIA, in the above-entitled action, by and through its undersigned counsel, Clinton & Muzyka, P.C., and moves this Honorable Court pursuant to Rule F(5) of the Supplemental Rules for Certain Admiralty and Maritime Claims to Default all persons who have failed to file and present Claims and Answers as Ordered by this Honorable Court on May 3, 2022. *See ECF No. 19.* The Plaintiff submits that it has complied with all the publication requirements contained in Rule F(4) and the time in which Claims were to be filed expired on July 29, 2022. *See Affidavit of Plaintiff's counsel attached hereto.*

**WHEREFORE**, the Plaintiff, Viking Power, LLC, prays that this Honorable Court Default all persons who failed to file Claims and Answers by July 29, 2022 in accordance with the Supplemental Rules for Certain Admiralty and Maritime Claims.

**Local Rule 7.1(a)(2) Certification**

The undersigned certifies that Local Rule 7.1(a)(2) was complied with on August 1, 2022 by telephone communication with each counsel of record, none of whom object to the filing of this Motion.

**VIKING POWER, LLC**  
By its attorney,  
**CLINTON & MUZYKA, P.C.**

/s/ John J. Bromley  
**Thomas J. Muzyka**  
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**CERTIFICATE OF SERVICE**

Pursuant to Local Rule 5.2, I hereby certify that the above document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 1, 2022.

/s/ John J. Bromley  
John J. Bromley